

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
FEB 21 1997
FCC MAIL ROOM

In the Matter of

DOCKET FILE COPY ORIGINAL

Closed Captioning and Video
Description of Programming

Implementation of Section 305 of the
Telecommunications Act of 1996

Video Programming Accessibility

MM Docket No. 95-176

COMMENTS OF WESTSOUND COMMUNITY ACCESS
TELEVISION, INC.,
IN THE NOTICE OF PROPOSED RULEMAKING

Westsound Community Access Television, Inc., respectfully submits the following comments in response to the Notice of Proposed Rulemaking, in the above-captioned proceeding, released January 17, 1997 ("NPRM"). The Commission seeks to issue rules implementing Section 713 of the 1996 Communications Act.

Westsound Community Access Television, Inc., is a member of the Alliance for Community Media, a national membership organization comprised of more than thirteen hundred organizations and individuals in more than seven hundred communities, connected with public, educational and governmental ("PEG") access on cable television systems. PEG centers throughout the nation produce more than 20,000 hours of original programming per week; this is more than CBS, NBC, ABC, and PBS combined.

PEG access centers would welcome the opportunity to present programming accessible to blind and deaf audiences. We believe that cable operators, the U.S. Department of Education, other governmental entities, or private funds and foundations may provide an appropriate source for funding. However, requiring PEG access centers to shoulder the financial and administrative burden of providing or requiring that every program be closed-captioned would mean the end of PEG access for deaf and non-deaf viewers alike. Westsound Community Access Television, Inc., urges the Commission to exempt PEG access centers from any blanket closed-captioning requirements, or, in the alternative, to identify and provide for alternate funding sources to allow some PEG programming to be made available to deaf audiences.

No. of Copies rec'd
List ABCDE

019

Both cost and the unique nature of public access programming prevent PEG centers from regularly providing closed captioning services. Westsound Community Access Television's total budget for 1997 is \$160,000.00, which covers all salaries, administrative expenses, capital purchases, and overhead costs.

The Commission has suggested that closed-captioning a program may be conservatively priced at \$2,500 per program-hour. If closed-captioning were required, Westsound Community Access Television, Inc., could caption only 64 hours of programming per year, with no funds left over for salaries, equipment, and expenses.

Moreover, PEG centers generally do not produce their own programming; instead, program producers are generally either individuals or small non-profit organizations working with volunteer personnel. Placing responsibility for closed-captioning on access program producers is not realistic. Requiring, for example, public high-schools' educational access distance learning-GED programs to close-caption could cause most school districts to cease offering these programs entirely. Requiring that PEG volunteer producers close-caption their programming at their own expense would contradict the purpose of PEG access, converting free access into access at \$2,500 per hour.

We strongly support the rights of deaf viewers to have access to PEG access programming. However, we must ask the Commission to require captioning only when outside funding source makes such captioning financially possible.

Respectfully Submitted,



Doyle Detroit

Executive Director
Westsound Community Access Television, Inc.
P.O. Box 844
Bremerton WA 98337
360/613-9734